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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC. a Colorado
corporation; ORACLE AMERICA,
INC., a Delaware corporation; and
ORACLE INTERNATIONAL
CORPORATION, a California
corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada
corporation; SETH RAVIN, an
individual

Defendants.

Case No. 2: 10-cv-0106-LRH-PAL

**[PROPOSED] ORDER SUSTAINING ORACLE'S
OBJECTION TO ORDER OF DISCOVERY
MAGISTRATE DENYING MOTION TO
MODIFY PROTECTIVE ORDER**

1 After consideration of the briefs and supporting documents submitted by the parties, the
2 Court orders as follows:

3 1. Oracle's objection to Magistrate Leen's Order, entered at Docket Number 364, is
4 sustained.

5 2. The Stipulated Protective Order, Docket Number 55 (the "Protective Order"), is
6 modified as follows: Notwithstanding the confidentiality restrictions in the Protective Order that
7 are applicable to discovery produced in this action designated as "Confidential Information" or
8 "Highly Confidential Information - Attorneys' Eyes Only," to the extent provided herein,
9 counsel for Plaintiffs and/or for their affiliates, may use discovery produced in this action by
10 third party CedarCrestone, Inc. ("CedarCrestone"), which has been designated by CedarCrestone
11 as "Confidential Information" or "Highly Confidential Information - Attorneys' Eyes Only" for
12 purposes of investigating, preparing for, and pursuing litigation, including for copyright
13 infringement, against CedarCrestone.

14 2. For purposes of paragraphs 8, 9, 10, 11, 12, and 14 of the Protective Order, with
15 respect to discovery provided by CedarCrestone, the terms "this Action" and "this litigation"
16 shall include litigation between Oracle (and any of its affiliates) and CedarCrestone relating to
17 the discovery produced by CedarCrestone.

18 3. All other confidentiality restrictions in the Protective Order remain intact.

19 4. Any party to this Protective Order may move for further modification of the
20 Protective Order to allow for use of, or greater access to, discovery produced in this action that
21 has been designated "Confidential Information" or "Highly Confidential Information -
22 Attorneys' Eyes Only," to prosecute and/or defend the litigation contemplated in paragraph 1
23 above, and this order is without prejudice to such a motion or opposition to such a motion.

24 IT IS SO ORDERED.

25
26 Dated: _____, 2012